

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen Williams
Magistrate Judge

Honorable Thomas Vanaskie
(Ret.),
Special Discovery Master

**THE ZHP PARTIES' MOTION TO
SEAL PURSUANT TO LOCAL CIVIL RULE 5.3**

Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), Princeton Pharmaceutical Inc. ("Princeton"), Huahai U.S. Inc. ("Huahai U.S.") and Solco Healthcare US, LLC ("Solco", and collectively with ZHP, Huahai U.S., and Princeton, "the ZHP Parties"), by and through their counsel, respectfully move to seal the following documents filed as Exhibits 4-8 at ECF No. [638](#); Exhibits B-C, E-F, H-L, N, and P-AA at ECF No. [685](#); and Exhibits to ECF No. [705](#):

1. ZHP00305868 ([ECF No. 638, Ex. 4](#))
2. ZHP00385769 ([ECF No. 638, Ex. 5](#))
3. ZHP00479762 ([ECF No. 638, Ex. 7](#))
4. ZHP00493010 ([ECF No. 638, Ex. 8](#))

5. ZHP00423144 ([ECF No. 638, Ex. 6](#))
6. PRINBURY00129588 (ECF No. [685](#), Ex. B)
7. ZHP00076700 (ECF No. [685](#), Ex. C)
8. PRINSTON00083640 (ECF No. [685](#), Ex. E)
9. PRINSTON00077836 (ECF No. [685](#), Ex. F)
10. PRINSTON00082994 (ECF No. [685](#), Ex. H)
11. ZHP00107709 (ECF No. [685](#), Ex. I)
12. PRINSTON0074125 (ECF No. [685](#), Ex. J)
13. PRINSTON00083026 (ECF No. [685](#), Ex. K)
14. PRINSTON00081549 (ECF No. [685](#), Ex. L)
15. PRINSTON00081570 (ECF No. [685](#), Ex. N)
16. ZHP0000215 (ECF No. [685](#), Ex. P)
17. ZHP02579748 (ECF No. [685](#), Ex. Q)
18. ZHP00494048 (ECF No. [685](#), Ex. S)
19. PRINSTON00162373 (ECF No. [685](#), Ex. R)
20. ZHP00458585 (ECF No. [685](#), Ex. T)
21. ZHP00476678¹
22. ZHP02270194 (ECF No. [685](#), Ex. U)

¹ This document was identified as an exhibit in an email communication from Christopher Geddis, Esq. dated Dec. 21, 2020, requesting that it be de-designated.

- 23. ZHP01893902 (ECF No. [685](#), Ex. V)
- 24. ZHP00310874 (ECF No. [685](#), Ex. W)
- 25. ZHP02125655 (ECF No. [685](#), Ex. X)
- 26. ZHP01976459 (ECF No. [685](#), Ex. Z)
- 27. HUAHAI-US00008050 (ECF No. [685](#), Ex. AA)
- 28. ZHP00183600 (ECF No. [705](#))
- 29. ZHP00182575 (ECF No. [705](#))

In support of this Motion, the ZHP Parties will rely on the Declaration of Kelly Bonner, Esq., dated February 3, 2021 (the “Bonner Declaration”), an index identifying the documents the ZHP Parties seek to seal (the “Index”), attached as Exhibit A thereto, and Declarations of the following ZHP custodians, attached as respectively **Exhibits B-H** thereto, which are incorporated by reference herein: Jucai Ge (**Exhibit B**); Jie Wang (**Exhibit C**); Mi Xu (**Exhibit D**); Jun Du (**Exhibit E**); Minli Zhang (**Exhibit F**); Linda Lin (**Exhibit G**); and Eric Gu (**Exhibit H**). (collectively, the “ZHP Declarations”). A proposed form of order, including Proposed Findings of Fact and Conclusions of Law pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because the relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(2) are contained in the Proposed Order, and supported by the Bonner

Declaration, along with the attached Index submitted as Exhibit A, and the ZHP Declarations, submitted as Exhibit B-H to that Declaration, which describe with particularity: (a) the nature of the materials at issue; (b) the legitimate private or public interest which warrants the relief sought; (c) the clearly defined and serious injury that would result if the relief sought is not granted; (d) why a less restrictive alternative to the relief sought is not available; (e) any prior order sealing the same materials in the pending action; (f) the identity of any party or nonparty known to be objecting to the sealing request; (g) the materials to which there is an objection; (h) the basis for the objection; and (i) if the material or information was previously sealed by the Court in the pending action, why the materials should not be maintained under seal. (*See* Index).

Dated: February 10, 2021

Respectfully submitted,

/s/ Seth A. Goldberg

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